

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA a/s/o Ethical Culture
Fieldston School and Ethical Culture Fieldston

Plaintiff,

-against-

TISHMAN CONSTRUCTION CORPORATION
OF NEW YORK, JOHN CIVETTA & SONS, INC.,
AMBROSINO, DEPINTO, SCHMIEDER
CONSULTING ENGINEERS, P.C., MUNOZ
ENGINEERING & LAND SURVEYING, P.C.,
COOPER, ROBERTSON & PARTNERS, LLP,
and LANGAN ENGINEERING AND
ENVIRONMENTAL SERVICES, INC.

Defendants.
-----X

Case No.: 07 CV 11178

**ANSWER TO AMBROSINO'S
CROSS-CLAIMS**

Judge Assigned:
Stein, J.

Defendant MUNOZ ENGINEERING & LAND SURVEYING, P.C., by its attorneys
KAUFMAN BORGEEST & RYAN LLP, as and for its Answer to co-defendant Ambrosino,
DePinto, Schmeider Consulting Engineers, Inc.'s cross-claims contained within its Answer to
Amended Complaint dated March 7, 2008, states upon information and belief as follows:

AS AND FOR AN ANSWER TO AMBROSINO'S FIRST CROSS-CLAIM

FIRST. In answering paragraph 46 of the pleading constituting the First Cross-Claim,
Defendant, MUNOZ ENGINEERING & LAND SURVEYING, P.C. denies the allegations
contained in paragraph 46 of the pleading constituting the Cross-Claim and respectfully refers all
questions of law to the Court.

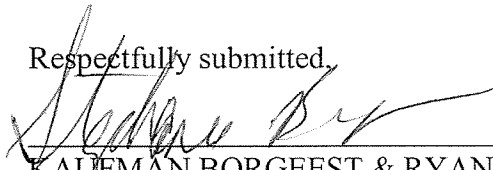
AS AND FOR AN ANSWER TO AMBROSINO'S SECOND CROSS-CLAIM

SECOND. In answering paragraph 47 of the pleading constituting the Second Cross-Claim, Defendant, MUNOZ ENGINEERING & LAND SURVEYING, P.C. denies the allegations contained in paragraph 47 of the pleading constituting the Cross-Claim and respectfully refers all questions of law to the Court.

WHEREFORE, answering defendant hereby demands judgment dismissing Defendant AMBROSINO's Cross-Claims herein together with the costs, attorney's fees and such other and further relief as this Court may deem appropriate.

Dated: Valhalla, New York
March 10, 2008

Respectfully submitted,



KAUFMAN BORGEEST & RYAN LLP

By: Stephanie B. Gitnik, Esq. (SG3977)

Michael P. Mezzacappa (MM 0757)

Attorneys for Defendant

**MUNOZ ENGINEERING & LAND
SURVEYING, P.C.**

200 Summit Lake Drive, First Floor

Valhalla, New York 10595

(914) 741-6100

Our File No.: 726.006

TO: Robert C. Sheps, Esq.
SHEPS LAW GROUP, P.C.
35 Pinelawn Road, Suite 106E
Melville, New York 11746

Patrick J. Corbett, Esq.
RUBIN, FIORELLA & FRIEDMAN LLP
Attorneys for John Civetta & Sons, Inc.
292 Madison Avenue, 11th Floor
New York, New York 10017
212-953-2381
File: 587-10174

Mark S. Krieg, Esq.
KRIEG ASSOCIATES, P.C.
Attorneys for Cooper, Robertson & Partners, LLP
5 Heather Court
Dix Hills, New York 11746
631-499-8406

Thomas H. Kukowski, Esq. (TK-1749)
Leonardo D'Allessandro (LD-0688)
MILBER MAKRIS PLOUSADIS & SEIDEN, LLP
Attorneys for Ambrosino, DePinto & Schmieder
Consulting Engineers, P.C.
3 Barker Avenue, 6th Floor
White Plains, New York 10601
914-681-8700

William Bennett, III, Esq.
BENNETT, GIULIANO, McDONNELL & PERRONE, LLP
Attorneys for Tishman Construction Corporation of New York
494 Eighth Avenue, 7th Floor
New York, New York 10001
646-328-0120

Lawrence Klein (LK-2875)
J. Gregory Lahr (JL-9969)
Gilbert Lee (GL-4010)
SEDGWICK, DETERT, MORAN & ARNOLD, LLP
Attorneys for Langan Engineering and Environmental Services Inc.
125 Broad Street, 39th Floor
New York, New York 10004-2400
212-422-0202

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Answer to Ambrosino's Cross-Claims upon following counsel, by placing same in the United States Mail, on this 10th day of March, 2008 and by filing the same electronically with the Court's ECF System:

To: Robert C. Sheps, Esq.
SHEPS LAW GROUP, P.C.
35 Pinelawn Road, Suite 106E
Melville, New York 11746

Patrick J. Corbett, Esq.
RUBIN, FIORELLA & FRIEDMAN LLP
Attorneys for John Civetta & Sons, Inc.
292 Madison Avenue, 11th Floor
New York, New York 10017
212-953-2381
File: 587-10174

Mark S. Krieg, Esq.
KRIEG ASSOCIATES, P.C.
Attorneys for Cooper, Roberson & Partners, LLP
5 Heather Court
Dix Hills, New York 11746
631-499-8406


Thomas H. Kukowski, Esq. (TK-1749)
Leonardo D'Allessandro (LD-0688)
Attorneys for Ambrosino, DePinto & Schmieder
Consulting Engineers, P.C.
3 Barker Avenue, 6th Floor
White Plains, New York 10601
914-681-8700

William Bennett, III, Esq.
BENNETT, GIULIANO, McDONNELL & PERRONE, LLP
Attorneys for Tishman Construction Corporation of New York
494 Eighth Avenue, 7th Floor
New York, New York 10001
646-328-0120

Lawrence Klein (LK-2875)
J. Gregory Lahr (JL-9969)
Gilbert Lee (GL-4010)
SEDGWICK, DETERT, MORAN & ARNOLD, LLP
Attorneys for Langan Engineering and Environmental Services Inc.
125 Broad Street, 39th Floor
New York, New York 10004-2400
212-422-0202

I certify that the foregoing statements made by me are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

Dated: Valhalla, New York
March 10, 2008


Stephanie B. Gitnik, Esq.